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Fighting for Employee Justice



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December 5, 2024


**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Court Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 20B  
New York, N.Y. 10007-1312

The requested extension is GRANTED. Defendants shall respond to the Complaint by **December 19, 2024**. If Defendants fail to do so, Plaintiff shall file a motion for default judgment pursuant to Federal Rule of Civil Procedure 55.

Date: December 6, 2024  
New York, New York

**SO ORDERED**

  
**JENNIFER L. ROCHON**  
United States District Judge

Re: ***Robles v. Lambsbreath, LLC***  
***Case No. 1:24-cv-07501-JLR***  
***Letter Motion for Extension of Time to File for Default***

Dear Judge Rochon:


Our office represents Plaintiff Primitivo Rochon ("Plaintiff") in the above-referenced Americans with Disabilities Act ("ADA") matter against Defendant Lambsbreath, LLC ("Defendant"). We write to respectfully request that this Honorable Court issue an Order extending the time to initiate default judgment proceedings for an additional 14 days, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, which allows the court to grant an extension for good cause.

In our efforts to resolve this matter, our staff personally contacted their business and spoke with an individual who claimed to be the owner. This individual indicated they were not aware of the nature of the suit. Upon their request, I sent copies of the relevant documents, and the owner stated their intention to retain counsel as their next step.

To provide the Defendant with an adequate opportunity to respond, we propose allowing them 15 days to retain counsel and address this matter. Should the Defendant fail to do so within this period, we will proceed to initiate default judgment proceedings as stipulated under Rule 55 of the Federal Rules of Civil Procedure.

We sincerely apologize for any inconvenience this extension request may cause and appreciate the Court's understanding and consideration in this matter.

Sincerely,



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Jon L. Norinsberg, Esq.

*Senior Partner*

Attorney for Plaintiff

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